

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

[1] Asha Nateef Tribble,
[2] Donald Keith Ellison,
[3] Jovanda R. Patterson

Defendant.

CRIMINAL NO. 19-541 (FAB)

AGREED UPON INFORMATIVE MOTION

TO THE HONORABLE COURT:

Defendant Donald Keith Ellison, by and through the undersigned attorneys and before this Honorable Court, respectfully requests that the Court postpone the upcoming status conference presently scheduled for Thursday, December 12, 2019 to January 9 or January 10, 2020.

Due to holiday flight schedules, the cost of changing flight reservations will pose an additional expense for one or more defendants. Additionally, the government has recently produced multiple voluminous discovery packages, totaling well over 500 gigabytes, which include over 437,300 documents. This total does not include numerous iPhone and iCloud data collections that have been provided, as well as an imaged laptop, all of which contain additional tens of thousands of files.

Each defendant will be in a far better position to advise the Court about pre-trial motions and a trial schedule should the Court postpone the presently scheduled status conference. The additional time will also allow counsel to be better informed as to the existence (or absence) of any outstanding discovery dispute, as well as allows ample time to resolve any such dispute.

The undersigned has conferred with counsel for co-defendants Ahsha Nateef Tribble and Jovanda R. Patterson. The undersigned has also conferred with counsel for the government, who has confirmed the government's availability on those dates, and who has no objection to the postponement of the status conference.

WHEREFORE, Defendant respectfully requests that this Honorable Court **GRANT** the Defendant's motion to postpone the upcoming status conference in this matter until January 9 or January 10, 2020.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of December 10, 2019.

MELLENDEZ TORRES LAW

/s/ Sonia I. Torres-Pabón

Sonia I. Torres-Pabón (USDC-PR No.
209310)

storres@melendeztorreslaw.com

MCS Plaza, Suite 1200

255 Ponce de Leon Ave.

San Juan, P.R. 00917

Tel: 787-281-8100

Fax: 787-281-8310

NORTON ROSE FULBRIGHT US LLP

/s Thomas W. Rinaldi

Thomas W. Rinaldi (*pro hac vice*)

thomas.rinaldi@nortonrosefulbright.com

William J. Leone (*pro hac vice*)

william.leone@nortonrosefulbright.com

Seth M. Kruglak (*pro hac vice*)

seth.kruglak@nortonrosefulbright.com

1301 Avenue of the Americas

New York, NY 10019

Tel: 212-318-3000

Fax: 212-318-3400

CERTIFICATION

IT IS HEREBY CERTIFIED that on this same date I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s Thomas W. Rinaldi

Thomas W. Rinaldi